

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiff,

v.

GOVERNMENT OF PUERTO RICO, et al.,

Defendants,

Civ. No. 12-2039 (GAG)

MOTION REQUESTING A HEARING IN CHAMBERS

TO THE HONORABLE COURT:

COME NOW the Commonwealth of Puerto Rico, through the undersigned counsel, and respectfully allege and pray as follows:

1. In February 7, 2017, the Governor of Puerto Rico introduced a bill creating the Department of Public Safety. Said bill consolidates law enforcement and emergency management agencies, including the Puerto Rico Police, into a single administrative entity while the current agencies become bureaus maintaining their operational autonomy.
2. On February 22, 2017, the Government of Puerto Rico met with representatives of the USDOJ and the TCA to discuss possible impacts of the bill on the Puerto Rico Police Reform. After said meeting, the Superintendent proposed amendments in order to guarantee continuance of the reform process, which were included in the bill.

3. The Government of Puerto Rico has maintained communications with the TCA during the legislative process and the TCA agreed that all the proposed changes were effectively included in the bill prior to its approval by the legislative assembly.
4. Thus, the Government of Puerto Rico was surprised when in an article from April 7, 2017 of “el Vocero” newspaper, an alleged source issued a statement to the press indicating that federal authorities “had allegedly serious concerns regarding the passing of the Department of Public Safety Act due to the fact that said Department was not prepared to execute the items contained in the Agreement between the Government of Puerto Rico and the USDOJ”.
5. Due to this, officials of the Government of Puerto Rico contacted the USDOJ in order to address any outstanding concerns regarding the creation of the Department of Public Safety. The USDOJ stated that the department did not have any mayor concerns regarding the bill and that they were grateful that the proposed amendments regarding the police reform were included, clearly contradicting what the alleged source said to the press.
6. Hence, pursuant to the court’s directive at docket No. 288 the Government of Puerto Rico hereby requests a hearing in chambers with the parties and the constitutional lawyers in order to address any concerns regarding communications and management of confidential information between the parties. It is on the best interest of the reform process at the Puerto Rico Police that this court addresses these issues in order to guarantee an effective communication between the parties.

WHEREFORE, the Government of Puerto Rico respectfully request a hearing in chambers to address the concerns stated in this motion.

IT IS HEREBY CERTIFIED that on this same date the instant document has been filed with the Court's CM/ECF System, which will simultaneously serve notice on all counsels of record to their respective registered e-mail addresses.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this April 17th, 2017.

WANDA VAZQUEZ GARCED
Secretary of Justice

WANDYMAR BURGOS VARGAS
Acting Deputy in Charge of
General Litigation

SUSANA PENAGARICANO BROWN
Acting Director of Federal Litigation
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